

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

**FILED**

MAY 15 2024

By BONNIE HACKLER  
Clerk, U.S. District Court  
Deputy Clerk

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JASON DALE COLE &  
CRYSTAL FAYE CHESSER,

*Defendants.*

**SEALED**

Case No. **CR 24 -080 RAW**

**INDICTMENT**

The Federal Grand Jury charges:

**COUNT ONE**

**POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE  
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT TWO**

**POSSESSION OF A MACHINE GUN  
[18 U.S.C. §§ 922(o) & 924(a)(2)]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, did knowingly possess a machinegun, to wit: one (1) Glock, Model 23Gen4, .40-caliber pistol, bearing serial number BKRZ205, that had been modified to shoot more than one (1) round of ammunition, without manual reloading, by a single function of the trigger,

in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

**COUNT THREE**

**FELON IN POSSESSION OF A FIREARM  
[18 U.S.C. §§ 922(g)(1) & 924(a)(8)]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, and knowing of such conviction, did knowingly possess in and affecting commerce, a firearm, to wit:

- One (1) Glock, Model 23Gen4, .40-caliber, machine gun pistol, bearing serial number BKRZ205; and,
- One (1) Kel-Tec, Model PMR-30, .22 Magnum caliber, semi-automatic pistol, bearing serial number W4980,

which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) & 924(a)(8).

**COUNT FOUR**

**USE AND CARRY OF A FIREARM DURING  
AND IN RELATION TO A DRUG TRAFFICKING CRIME  
[18 U.S.C. §§ 924(c)(1)(A)(i) & 924(c)(1)(B)(ii)]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, did knowingly use and carry a firearm (including a machine gun), during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute Methamphetamine, as charged in Count One of this Indictment, and in furtherance of the crime did possess a firearm, to wit:

- one (1) Glock, Model 23Gen4, .40-caliber pistol, bearing serial number BKRZ205, that had been modified to shoot more than one (1) round of ammunition, without manual reloading, by a single function of the trigger (a machine gun); and,

- one (1) Kel-Tec, Model PMR-30, .22 Magnum caliber, semi-automatic pistol, bearing serial number W4980,

in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(B)(ii).

**COUNT FIVE**

**POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE  
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT SIX**

**POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA  
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(D)]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, did knowingly and intentionally possess with intent to distribute less than 50 kilograms of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

**COUNT SEVEN**

**FELON IN POSSESSION OF A FIREARM  
[18 U.S.C. §§ 922(g)(1) & 924(a)(8)]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, and knowing of such conviction, did knowingly possess in and affecting commerce, a firearm, to wit:

- one (1) Nordic Components, Model NC-10, multi-caliber, semi-automatic rifle, serial number N00388, with an attached firearm silencer;
- one (1) Remington, Model 11-48, 12-gauge, semi-automatic shotgun, serial number 5519671;
- one (1) Ithaca, Model 37, 16-gauge, pump action shotgun, serial number 430459;
- one (1) Marlin, Model 1894, .44 Magnum caliber, lever action rifle, serial number 18112911;
- one (1) Ruger, New Model Super Blackhawk, .44 Magnum caliber, revolver, serial number 82-12217;
- one (1) Tanfoglio, Model EASA, .22-caliber, revolver, serial number E28849;
- one (1) Firearms Import and Export Co., Model E15, .22-caliber, revolver, serial number 37629; and,
- one (1) Remington, Model 1100, 12-gauge, semi-automatic shotgun, serial number L006516V,

which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### **COUNT EIGHT**

#### **POSSESSION OF UNREGISTERED FIREARM [26 U.S.C. §§ 5845, 5861(d) & 5871]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, did knowingly possess a firearm to wit:

- one (1) firearm silencer described as a cylindrical device, approximately 12.3 inches in length and 1.7 inches in diameter, containing interior baffles, internally threaded, and not identified by a serial number;
- one (1) firearm silencer described as a cylindrical device, approximately 9 inches in length and 1.6 inches in diameter, containing six interior baffles, wrapped in electrical tape, and not identified by a serial number;

- one (1) firearm silencer described as a cylindrical device, approximately 9 inches in length and 1.6 inches in diameter, containing eight interior baffles, and not identified by a serial number;
- one (1) firearm silencer described as a cylindrical device, approximately 10 inches in length and 2 inches in diameter, internally threaded, and not identified by a serial number; and,
- one (1) firearm silencer described as a cylindrical device, approximately 9.5 inches in length and 1.7 inches in diameter, containing a monolithic baffle, internally threaded, and not identified by a serial number,

which was not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5845, 5861(d) and 5871.

**COUNT NINE**

**USE AND CARRY OF A FIREARM DURING  
AND IN RELATION TO A DRUG TRAFFICKING CRIME  
[18 U.S.C. §§ 924(c)(1)(A)(i) & 924(c)(1)(B)(ii)]**

On or about November 18, 2023, in the Eastern District of Oklahoma, the defendant, **JASON DALE COLE**, did knowingly use and carry a firearm, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute Methamphetamine, as charged in Count Five of this Indictment, and in furtherance of the crime did possess a firearm, to wit:

- one (1) Nordic Components, Model NC-10, multi-caliber, semi-automatic rifle, serial number N00388; and
- one (1) firearm silencer described as a cylindrical device, approximately 12.3 inches in length and 1.7 inches in diameter, containing interior baffles, internally threaded, and not identified by a serial number,

in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(B)(ii).

**COUNT TEN**

**MAINTAINING DRUG INVOLVED PREMISES**

**[21 U.S.C. § 856(a)(1) & 18 U.S.C. § 2]**

On or about November 18, 2023, in the Eastern District of Oklahoma, **JASON DALE COLE** and **CRYSTAL FAYE CHESSER**, defendants herein, did knowingly use and maintain a residence at 20725 Gilmer Road, Okmulgee, Oklahoma, for the purpose of distributing and using any controlled substance, to wit: methamphetamine, which is a Schedule II Controlled Substance; and marijuana, which is a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION**

**[18 U.S.C. § 924(d), 21 U.S.C. § 853, 26 U.S.C. § 5872, & 28 U.S.C. § 2461(c)]**

The allegations contained in Counts One through Ten of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One through Ten of this Indictment involving violations of Title 18, United States Code, Sections 922(g)(1), 922(o), 924(a)(2), 924(c)(1)(A)(i) and 924(c)(1)(B)(ii), Title 21, United States Code, Sections 841(a)(1), 846(b)(1)(A), (B), and (D), and 856(a)(2), and Title 26 United States Code, Sections 5845, 5861(d), and 5871, the defendants, **JASON DALE COLE** and **CRYSTAL FAYE CHESSER**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c), any and all of the defendants' right, title and interest in all property constituting and derived from any proceeds obtained directly and indirectly as the result

of such offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, as well as all firearms and ammunition involved in the commission of the offenses, including, but not limited to:

- one (1) Glock, Model 23Gen4, .40-caliber, machine gun pistol, bearing serial number BKRZ205;
- one (1) Kel-Tec, Model PMR-30, semi-automatic pistol, bearing serial number W4980;
- one (1) Nordic Components, Model NC-10, multi-caliber, semi-automatic rifle, serial number N00388, with an attached firearm silencer;
- one (1) Remington, Model 11-48, 12-gauge, semi-automatic shotgun, serial number 5519671;
- one (1) Ithaca, Model 37, 16-gauge, pump action shotgun, serial number 430459;
- one (1) Marlin, Model 1894, .44 Magnum caliber, lever action rifle, serial number 18112911;
- one (1) Ruger, New Model Super Blackhawk, .44 Magnum caliber, revolver, serial number 82-12217;
- one (1) Tanfoglio, Model EASA, .22-caliber, revolver, serial number E28849;
- one (1) Firearms Import and Export Co., Model E15, .22-caliber, revolver, serial number 37629; and,
- one (1) Remington, Model 1100, 12-gauge, semi-automatic shotgun, serial number L006516V,
- one (1) firearm silencer described as a cylindrical device, approximately 12.3 inches in length and 1.7 inches in diameter, containing interior baffles, internally threaded, and not identified by a serial number;
- one (1) firearm silencer described as a cylindrical device, approximately 9 inches in length and 1.6 inches in diameter, containing six (6) interior baffles, wrapped in electrical tape, and not identified by a serial number;
- one (1) firearm silencer described as a cylindrical device, approximately 9 inches in length and 1.6 inches in diameter, containing eight (8) interior baffles, and not identified by a serial number;

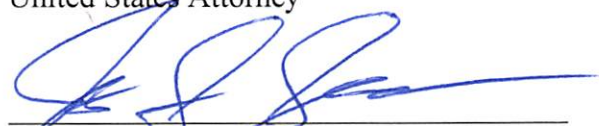


- one (1) firearm silencer described as a cylindrical device, approximately 10 inches in length and 2 inches in diameter, internally threaded, and not identified by a serial number;
- one (1) firearm silencer described as a cylindrical device, approximately 9.5 inches in length and 1.7 inches in diameter, containing a monolithic baffle, internally threaded, and not identified by a serial number; and
- approximately \$10,000.00 in United States Currency.

A TRUE BILL:

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

CHRISTOPHER J. WILSON  
United States Attorney



JAMES S. SEAMAN, LA BAR # 25496  
Assistant United States Attorney

s / Foreperson  
FOREPERSON OF THE GRAND JURY